

Submission to NSW DRAFT Coastal IFOA

I oppose the implementation of the new Integrated Forestry Operations Approval

Dear Environment Protection Authority,

I am writing to express my opposition to the Government's proposed changes to the Integrated Forestry Operations Approval (IFOA).

As a neighbouring landholder of our NSW state forests in NE NSW I am disgusted by the proposal to remap HCVOG and Rainforest areas previously excluded from logging under the RFA's and mapped as part of the national reserve system to provide a Comprehensive, Adequate, Representative Reserve system to protect in perpetuity irreplaceable ecological values in the NSW native forest estate.

The proposal to remap HCVOG, HVHOG and Rainforest areas in order to pillage them for high quality saw logs is a retrograde and criminal act driven only by greed and the demands of the timber industry. These forests mapped as old growth and rainforest are of immense value as the most intact stands of forests left on State Forests as they have escaped the intensive logging of the past 20 years.

The eucalypt stands have a high number of hollow-bearing trees that provide the nests and dens essential for a plethora of hollow-dependent animals and numerous mature trees that provide the abundant browse, nectar and seeds that are essential food resources for a multitude of species. Our rainforests have outstanding biodiversity and a multitude of unique plants and animals. They are irreplaceable assets of immense importance for the maintenance of populations of forest dependent species throughout State Forests. They provide important refugia and stepping stones between our national parks.

The CAR Reserve system must be protected from logging and state forests currently available for industrial-scale logging must be managed in accordance with ecologically sustainable forest management practices (ESFM). The EPA has failed to regulate adequately the UNE IFOA and FCNSW has been allowed to breach, without penalty, the laws currently in place. The new IFOA erodes the existing logging laws in order to perpetuate a loss making business model that costs the NSW tax payer and destroys biodiversity and catchment health.

I am of the firm opinion that the NSW native forest estate has been badly managed by FCNSW and unrealistic wood supply agreements negotiated in the interests of the timber industry at the expense of our forest landscapes.

To protect our threatened species, native wildlife and water catchments **NATIVE FOREST LOGGING MUST BE STOPPED** as soon as possible and the DRAFT Coastal IFOA rejected in favour of a transition plan which maps a path out of native forests logging to a 100 percent FSC certified plantation-based timber resource.

THE NEW IFOA FAILS TO CONSIDER CLIMATE CHANGE IMPACTS

As the impacts of global warming increase our native wildlife will need intact forest ecosystems to survive the heatwaves, droughts and extreme weather events predicted to occur. Increasing the intensity of logging will expose our forest landscapes to erosion from heavy rainfall events, heatwaves and catastrophic fire danger. Regrowth forests (pseudo-plantations) will have a high risk of being destroyed by fire. This in turn will threaten rural communities, landholders and livestock adjacent to state forest areas.

The new IFOA abandons any semblance of ecologically sustainable forest management (ESFM) by proposing the clear fell of 140,000 hectares of coastal forests between Grafton and Taree; 'remapping and rezoning' old-growth for logging; reducing headwater stream buffers; permitting the logging of giant trees and approximately doubling the intensity of logging in the 'selective harvesting zone'.

By abandoning ESFM, the Government has destroyed the social license of the logging industry. The negative health impacts on local communities, job losses, erosion of water quality and decreases in biodiversity and threatened species (i.e, koalas and gliders) are some of the cumulative impacts not addressed by this proposal.

The new IFOA ignores reality. Widespread declines in wildlife has prompted the Australian Senate to call an inquiry into our threatened species crisis. Over-logging has reduced sawlog resources throughout coastal NSW, a fact recognised by the industry itself. The number of jobs and mills has collapsed and logging now accounts for about 0.03% of primary industries employment. This will get worse as climate change and forest dieback make future timber resources increasingly uncertain—an issue highlighted in the the Natural Resources Commission report but ignored in the IFOA.

The new IFOA will heighten the impacts of logging on threatened species, and exacerbate key threatening processes such as the loss of hollow-bearing trees and bell-miner associated dieback. The intensive harvesting zone will destroy almost half of the mapped high-quality koala habitat in state forests.

It is becoming increasingly clear that the best use of forests is to protect the wildlife that the tourism industry depends upon; protect the water supplies that our communities rely on and store the carbon that is driving climate breakdown. Polling in the electorates of Ballina and Lismore show that 90% of people agree. Yet the new IFOA directly undermines all of these imperatives, just to meet unrealistic wood supplies for a few short years.

Destroying what is left of the ecological values of state forests and logging protected areas to meet wood supply is not the action of a responsible Government. One of the recommendations in Ewan Waller's report into the RFA consultation was that the Government conduct a review of the logging industry considering climate change, conservation, socio-economic issues and support for the logging industry. This is the least the community can expect.

I urge you to abandon the IFOA, and instead use the end of the Regional Forest Agreements to transition out of native forest logging on public land and implement positive alternatives like NPA's [Great Koala National Park](#) and [Forests For All](#) proposals.

I call upon you to:

- 1 Stop the NSW Government proceeding with these draconian changes.
- 2 Ensure that public forests are managed for the public good (ie: tourism, environmental repair, carbon sequestration and storage, wildlife habitat and provision of clean, abundant water)
- 3 Stop planning to log areas protected as habitat for threatened species, Koalas, oldgrowth forest, and stream buffers.
- 4 Stop increasing logging intensity and legalising clearfell logging along the North Coast of NSW.
- 5 Stop propping up the rapacious native forest logging industry at the cost of species extinction, logging dieback, reduced stream flows and water quality decline.
- 6 End the logging of public native forest and complete the transition of the timber industry to 100% plantations.

Yours sincerely,

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NSW [REDACTED]